

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED SOVEREIGN AMERICANS, INC., <i>et al.</i> , Petitioners,)	CASE NO. 5:24-CV-01359
)	JUDGE JOHN R. ADAMS
)	
)	
v.)	
)	
STATE OF OHIO, <i>et al.</i> , Respondents.)	<u>RESPONDENT UNITED STATES OF AMERICA'S MOTION TO DISMISS AMENDED PETITION</u>
)	

Pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), Respondent Merrick Garland, in his official capacity as Attorney General of the United States of America, hereby moves to dismiss Petitioners' Amended Petition for lack of subject matter jurisdiction and failure to state a claim upon which relief may be granted. The grounds for this motion are set forth in the attached brief.

Respectfully Submitted,

REBECCA C. LUTZKO
United States Attorney
Northern District of Ohio

By: /s/ Karen E. Swanson Haan
KAREN E. SWANSON HAAN (#0082518)
Assistant United States Attorney
United States Court House
801 West Superior Avenue, Suite 400
Cleveland, Ohio 44113
Telephone: 216.622.3851
Email: Karen.Swanson.Haan@usdoj.gov

*Attorney for Respondent Merrick Garland,
In His Official Capacity as Attorney General
Of the United States of America*